

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 30 2015

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
STEVEN BLAKENEY,)
)
Defendant.)

4:15CR354 SNLJ/NCC

INDICTMENT

COUNT 1 – CONSPIRACY AGAINST RIGHTS

The Grand Jury charges that:

1. At all times relevant to this Indictment, Defendant STEVEN BLAKENEY was employed as a Police Officer with the City of Pine Lawn, Missouri (“Pine Lawn”).
2. At all times relevant to this Indictment, N.F. was a candidate for the office of Mayor of Pine Lawn and was present in Missouri, a State of the United States.
3. At all times relevant to this Indictment, A.S. was employed at the Pine Lawn Market, which was located in Pine Lawn.

THE CONSPIRACY

4. On or about March 31, 2013, in St. Louis County, within the Eastern District of Missouri,

STEVEN BLAKENEY,

the Defendant herein, along with A.S. and others known and unknown to the Grand Jury, while acting under color of law, willfully combined, conspired, and agreed with each other, to injure,

oppress, threaten, and intimidate N.F. in the free exercise and enjoyment of rights and privileges secured to N.F. by the Constitution of the United States.

OBJECT OF THE CONSPIRACY

5. The object of the conspiracy was to violate N.F.'s right not to be subjected to unreasonable seizure by effecting the arrest of N.F. based on false allegations and without probable cause, and to publicize the arrest in order to hamper N.F.'s chance of winning the mayoral election, which was scheduled to occur on April 2, 2013.

OVERT ACTS

6. The following overt acts in furtherance of the above described conspiracy occurred on March 31, 2013:

a. Defendant STEVEN BLAKENEY summoned A.S. to the Pine Lawn Market and directed A.S. to call the police and report that N.F. had stolen property from the Pine Lawn Market, well knowing that N.F. had not stolen property. Defendant STEVEN BLAKENEY directed A.S. to wait until Defendant left the Pine Lawn Market before placing the call to the police.

b. As instructed, after Defendant STEVEN BLAKENEY left, A.S. made the 911 call to the police and falsely reported that N.F. had stolen property from the Pine Lawn Market.

c. Defendant STEVEN BLAKENEY returned to the Pine Lawn Market in response to the 911 call.

d. Defendant STEVEN BLAKENEY caused and directed A.S. to provide a written statement containing false allegations about the incident at the Pine Lawn Market.

A.S.'s son wrote the statement for A.S. Defendant STEVEN BLAKENEY told A.S.'s

son what to include in the written statement, including the false allegations.

e. Defendant STEVEN BLAKENEY caused false allegations to be provided to the Prosecutor for Pine Lawn, who then authorized the issuance of a warrant for the arrest of N.F.

f. Defendant STEVEN BLAKENEY, other Pine Lawn police officers, and the Prosecutor for Pine Lawn went to N.F.'s residence, placed her under arrest, and transported her to the Pine Lawn police station, where television news outlets were waiting.

All in violation of Title 18, United States Code, Section 241.

COUNT 2 – DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 6 of Count 1 of this Indictment are restated and incorporated fully herein.

2. On or about March 31, 2013, in St. Louis County, within the Eastern District of Missouri,

STEVEN BLAKENEY,

the Defendant herein, while acting under color of law, willfully deprived N.F. of the right, protected and secured by the Constitution and laws of the United States, not to be subjected to unreasonable seizure by a law enforcement officer, in that the Defendant caused a warrant to be issued for the arrest of N.F. based on false allegations and without probable cause.

In violation of Title 18, United States Code, Sections 242 and 2.

COUNT 3 – FALSIFICATION OF RECORDS

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 6 of Count 1 of this Indictment are restated and incorporated herein.

2. Between on or about March 31, 2013 and on or about May 31, 2013, in St. Louis County, within the Eastern District of Missouri, .

STEVEN BLAKENEY,

the Defendant herein, did knowingly falsify and make a false entry in, and cause to be falsified and a false entry to be made in, a record and document, to wit: Pine Lawn Police Department Incident Report #13-1337 related to the arrest of N.F., with the intent to impede, obstruct, and

influence, and in contemplation of, the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, which was and is a department and agency of the United States.

In violation of Title 18, United States Code, Sections 1519 and 2.

A TRUE BILL.

FOREPERSON

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